

SILLS CUMMIS & GROSS P.C.

Jeffrey J. Greenbaum

Katherine M. Lieb

One Riverfront Plaza

Newark, New Jersey 07102

(973) 643-7000

LINKLATERS LLP

Adeel A. Mangi

George LoBiondo

Patrick Ashby (admitted *pro hac vice*)

Sara A. Arrow

Julia Long (admitted *pro hac vice*)

1290 Avenue of the Americas

New York, New York 10104

(212) 903-9000

*Attorneys for Plaintiff**Johnson & Johnson Health Care Systems Inc.***UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY****JOHNSON & JOHNSON****HEALTH CARE SYSTEMS INC.,**

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,**

Defendants.

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Civil Action No. 22-2632(CCC)(CLW)

Hon. Claire C. Cecchi, U.S.D.J.

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

NOTICE OF MOTION TO SEAL**COUNSEL:**

PLEASE TAKE NOTICE that on May 5, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”) will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with (i) the Motion of Defendant Save On SP, LLC (“SaveOnSP”) to Compel JJHCS to Run an Additional Search Term Regarding its CAP Appeals Process, dated February 3, 2025, with related briefing dated February 26 and March 10, 2025 (ECF Nos. 517, 535, 550, & 551), filed on February 7, February 27, March 10, and March 11, 2025 (the “CAP Appeals Motion”); and (ii) SaveOnSP’s Motion to Compel JJHCS to Produce Documents Responsive to Requests Nos. 107 and 108 Related to FRAS Contracts, dated February 3, 2025, with related briefing dated February 21 and March 11, 2025 (ECF Nos. 519, 532, & 566), filed on February 7, February 21, and March 14, 2025 (the “FRAS Motion”);

(b) Permitting JJHCS to file the proposed public versions of the CAP Appeals Motion (ECF Nos. 517, 535, 550, & 551) and the FRAS Motion (ECF Nos. 519, 532, & 566), attached as Exhibits A and B to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

PLEASE TAKE FURTHER NOTICE that no party objects to the relief requested.

Respectfully submitted,

SILLS CUMMIS & GROSS P.C.
One Riverfront Plaza
Newark, New Jersey 07102
(973) 643-7000
jgreenbaum@sillscummis.com
klieb@sillscummis.com

By: s/ Jeffrey J. Greenbaum
JEFFREY J. GREENBAUM
KATHERINE M. LIEB

LINKLATERS LLP

Adeel A. Mangi

George LoBiondo

Patrick Ashby (admitted pro hac vice)

Sara A. Arrow

Julia Long (admitted pro hac vice)

1290 Avenue of the Americas

New York, New York 10104

(212) 903-9000

*Attorneys for Plaintiff Johnson & Johnson
Health Care Systems Inc.*

Dated: April 10, 2025